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24 Attorneys for Plaintiffs

25 UNITED STATES DISTRICT COURT
26
27 NORTHERN DISTRICT OF CALIFORNIA

28 VICTORIA MUÑOZ, *et al.*,

29 Plaintiffs,

30 v.

31 SACRAMENTO AREA COUNCIL OF
32 GOVERNMENTS, *et al.*,

33 Defendants.

34 Case No. C 05-01525 (JSW) (EDL)

35 **JOINT STIPULATION AND**
36 **{PROPOSED} ORDER**
37 **REGARDING ADMINISTRATIVE**
38 **RELIEF FROM CASE SCHEDULE**
39 **IN ORDER TO FACILITATE**
40 **SETTLEMENT**

1 Pursuant to Local Rules 7-7, 7-11, and 7-12, it is hereby stipulated by and between
2 plaintiffs and defendant Riverside County Transportation Commission (“RCTC”) that:

3 1. This Court has scheduled RCTC’s motion for transfer of venue to be heard on
4 April 7, 2006, and plaintiffs’ motion for class certification to be heard on June 2, 2006;

5 2. Plaintiffs and each of the four remaining defendants, including RCTC, are in the
6 process of negotiating written agreements to settle this litigation on a classwide basis;

7 3. No briefs have been filed relating to plaintiffs’ motion for class certification;

8 4. The deadline for filing of an opposition to RCTC’s motion for transfer of venue is
9 March 17, 2006 and no opposition has yet been filed;

10 5. To facilitate negotiation of a settlement agreement with plaintiffs, RCTC hereby
11 withdraws its motion for transfer of venue pursuant to Local Rule 7-7(e); and

12 6. To facilitate negotiation of settlement agreements with each of the four defendants,
13 plaintiffs request that the Court take plaintiffs’ motion for class certification off-calendar.

1 DATE: March 14, 2006

2 Respectfully submitted,

3 CALIFORNIA CENTER FOR LAW
4 AND THE DEAF
5 J. Kendrick Kresse
6 Jennifer Pesek

7 DISABILITY RIGHTS LEGAL CENTER
8 Shawna L. Parks

9 MORRISON & FOERSTER, LLP
10 Patricia S. Mar
11 Yoshiko Inoue
12 Rita F. Lin

13 By: _____ /s/ Rita Lin

14 Attorneys for Plaintiffs

15 DATE: March 14, 2006

16 Marc S. Ehrlich
17 Best Best & Krieger LLP
18 5 Park Plz, #1500
19 Irvine, CA 92614

20 By: _____ /s/ Marc. S. Ehrlich

21 Attorney for Defendant Riverside
22 County Transportation Commission

23 **RULE 45 ATTESTATION**

24 In accordance with General Order 45, concurrence in the filing of this document has been
25 obtained from each of the other signatories and I shall maintain records to support this
26 concurrence for subsequent production for the court if so ordered or for inspection upon request
27 by a party.

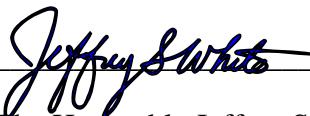
28 _____ /s/ Rita F. Lin

29 Rita F. Lin
30 Attorney for Plaintiffs

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 The parties shall submit a status report no later than 60 days from the date of this order regarding
3 the settlement negotiations and the pending motion for class certification.

4 Dated: March 15, 2006

5 
6 The Honorable Jeffrey S. White
7 United States District Judge

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